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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**
12

13 In re

14 PG&E CORPORATION

15 and
16

17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 * All papers shall be filed in the Lead Case
23 No. 19-30088 DM.
24
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Case Nos. 19-30088 DM (Lead Case)
19-30089 DM

Chapter 11
Jointly Administered

Date: July 24, 2019
Time: 9:30 a.m.
Place: Courtroom 17
450 Golden Gate Avenue
San Francisco, California

DKT # 2741

OBJECTION DEADLINE: July 16, 2019

26 **JOINDER BY TURN IN MOTION BY AD HOC COMMITTEE OF SENIOR UNSECURED**
27 **NOTEHOLDERS TO TERMINATE THE EXCLUSIVE PERIODS PURSUANT TO**
28 **BANKRUPTCY CODE SECTION 1121(D)(1) OF THE BANKRUPTCY CODE**

1 The Utility Reform Network (“TURN”) hereby joins in the Motion by Ad Hoc Committee of
2 Senior Unsecured Noteholders to Terminate the Exclusive Periods Pursuant to Bankruptcy Code
3 Section 1121(d)(1) of the Bankruptcy Code (the “Motion”) and asks that the Court immediately
4 terminate the Debtors’ exclusive right to file and seek acceptances of a plan.

5 TURN does not, at this time, explicitly or implicitly endorse the plan construct described by
6 the Senior Unsecured Noteholders in the Motion. What is notable is that the Senior Unsecured
7 Noteholders are proposing a substantial influx of new capital to address the many needs of the
8 Debtors and creditors with a neutral impact on ratepayers going forward. By contrast, all reports are
9 that the Debtors and stockholders would shift to others the risk and responsibility for corporate
10 malfeasance and criminality with little or no impact on their own positions.

11 TURN believes that competing plans will ultimately yield the best possible result for
12 ratepayers and creditors, supports the Motion, and respectfully requests that this Court grant it.

13 Dated: July 10, 2019

BINDER & MALTER, LLP

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15 By: /s/ Robert G. Harris
16 Robert G. Harris

17 Attorneys for TURN, the Utility Reform Network
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